

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ASHLEY PIERRELOUIS, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

GOGO INC., MICHAEL J. SMALL,
OAKLEIGH THORNE, NORMAN
SMAGLEY, BARRY ROWAN, and JOHN
WADE,

Defendants.

Case No.: 1:18-cv-04473

CLASS ACTION

Hon. Jorge L. Alonso

**DANIEL ROGERS' MOTION FOR
APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF LEAD COUNSEL**

Daniel Rogers (“Movant”) respectfully moves this Court for an Order (attached hereto as Exhibit A): (a) appointing Movant as lead plaintiff in this action pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4, and (b) approving Movant’s selection of Glancy Prongay & Murray LLP as Lead Counsel and Lawrence Kamin, LLC, as Liaison Counsel for the class.

In support of this Motion, Movant submits a Memorandum of Law and true and correct copies of the following exhibits:

Exhibit A: The [Proposed] Order

Exhibit B: Press release published June 27, 2018, on *Business Wire* announcing the pendency of the securities class action against defendants herein:
Pierrelouis v. Gogo Inc. et al, Case No. 1:18-cv-04473;

Exhibit C: Signed Certification of Movant;

Exhibit D: Table of Movant’s calculated losses, as a result of transactions in Gogo Inc. securities;

Exhibit E: Firm résumé of Glancy Prongay & Murray LLP; and

Exhibit F: Firm résumé of Lawrence Kamin, LLC.

Dated: August 27, 2018

Respectfully submitted,

/s/ Mitchell B. Goldberg

LAWRENCE KAMIN, LLC

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[Proposed] Liaison Counsel for Movant and the Class

– and –

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[Proposed] Lead Counsel for Movant and the Class